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 FREESCALE SEMICONDUCTOR, INC.

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION**

MEDIATEK INC.

Plaintiff,

v.

FREESCALE SEMICONDUCTOR, INC.

Defendant.

**Civil Action No. 4:11-cv-05341 (YGR)**

**[PROPOSED] ORDER GRANTING  
 JOINT STIPULATED DISMISSAL OF  
 '244 PATENT**

Hon. Yvonne Gonzalez Rogers

1 WHEREAS, in the instant case, MediaTek, Inc. (MediaTek) alleged that Freescale  
 2 Semiconductor, Inc.'s (Freescale's) MCF-5225X and MCF-521X product families ("the Accused  
 3 Products") infringe U.S. Patent No. 6,311,244 ("the '244 patent"); and

4 WHEREAS Freescale filed counterclaims seeking a declaratory judgment that the Accused  
 5 Products do not infringe the asserted '244 patent claims, and that those claims are invalid;

6 Plaintiff MediaTek and Defendant Freescale hereby agree and jointly stipulate as follows:

7 1. Pursuant to Federal Rules of Civil Procedure 41(a)(2), MediaTek hereby dismisses with  
 8 prejudice its infringement claims against the Accused Products based on the '244 patent;

9 2. Pursuant to Federal Rules of Civil Procedure 41(c), Freescale hereby dismisses with  
 10 prejudice its counterclaim seeking a declaratory judgment that the Accused Products do not infringe the  
 11 asserted '244 patent claims;

12 3. Pursuant to Federal Rules of Civil Procedure 41(c), Freescale hereby dismisses without  
 13 prejudice its counterclaims seeking a declaratory judgment that the asserted '244 patent claims are  
 14 invalid;

15 4. This stipulation shall not represent an adjudication of the merits of any remaining patent  
 16 infringement claims, counterclaims, or defenses, and shall not be deemed as an admission by either party  
 17 with respect to those claims, counterclaims, or defenses; and

18 5. Each party shall bear its own costs and attorney fees with respect to the aforementioned  
 19 patent infringement claims, counterclaims, and defenses.

20  
 21 Respectfully submitted,

22 DATED: July 29, 2014

23 By: /s/ Keith Slenkovich  
 Keith Slenkovich

24 *Attorneys for MediaTek, Inc.*

25  
 26 DATED: July 29, 2014

27 By: /s/ Alex Hadjis  
 Alex Hadjis

28 *Attorneys for Freescale Semiconductor, Inc.*

**SIGNATURE ATTESTATION**

I hereby attest that concurrence in the filing of this document has been obtained from Defendant Freescale Semiconductor, Inc. and I have on file records to support this concurrence for subsequent production for the Court if so ordered or for inspection upon request. I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed this 29th day of July, 2014, at Palo Alto, California.

/s/ Keith Slenkovich

Keith Slenkovich

**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: \_\_\_\_\_, 2014

\_\_\_\_\_  
United States District Judge